
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Michael A. Hammer
	:	
v.	:	Mag. No. 21-10402
	:	
LYDELL MERCEDES	:	<u>CRIMINAL COMPLAINT</u>
	:	
	:	

I, Deputy U.S. Marshal Rodney Severe, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Deputy U.S. Marshal with the United States Marshals Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

s/ Rodny Severe
Deputy Marshal Rodney Severe
U.S. Marshals Service

Deputy Marshal Severe attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on December 3, 2021 in New Jersey.

Honorable Michael A. Hammer
United States Magistrate Judge

s/ Hon. Michael A. Hammer
Signature of Judicial Officer

ATTACHMENT A

On or about November 5, 2021, in Essex County, in the District of New Jersey, the defendant,

LYDELL MERCEDES,

did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

ATTACHMENT B

I, Rodney Severe, am a Deputy Marshal with the United States Marshals Service, and I am fully familiar with the facts set forth herein based on my own investigation and my conversations with other agents, and members of law enforcement and my review of their reports and of items of evidence. Where statements of others are related herein, they are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Since this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

1. On or about November 5, 2021, law enforcement on patrol in the vicinity of Court Street and Lincoln Street in Newark, New Jersey, observed Lydell Mercedes ("Mercedes"), as Mercedes walked through a parking lot that led from the Oscar Myles housing complex to Lincoln Street (the "Lot"). After Mercedes looked in the direction of the officers' unmarked cars, his eyes widened, and he began walking in the direction from which he came. Mercedes had a black fanny pack (the "Fanny Pack") and, upon his apparent notice of the officers, he tucked the Fanny Pack under his right arm, as if attempting to conceal it from the officers' view.

2. An officer drove his car into the Lot, to investigate further. In response, Mercedes began walking faster. Once the officer walked towards Mercedes, Mercedes began to run, and the officer gave chase. As Mercedes ran, he continued to clutch the Fanny Pack. The officer briefly lost sight of Mercedes as Mercedes turned a corner. Mercedes was then apprehended by another officer. At the time of his apprehension, Mercedes no longer had the Fanny Pack.

3. The officer who chased Mercedes returned to the area at which he lost sight of Mercedes, and recovered the Fanny Pack, which was on the ground, with a partially unopened zipper. Through the open zipper, the officer observed what he immediately recognized as "bricks"¹ of suspected heroin. A subsequent search of the Fanny Pack revealed that it held approximately 359 glassines of suspected heroin,² with assorted stamps, including "Black Box," "Loaded Bases," and "Wu Tang," as well as approximately 97 clear vials of suspected cocaine base, as well as at least one bag of marijuana.

¹ A "brick" is approximately 50 individual glassines of opioids, bundled together for distribution.

² Law enforcement has examined all suspected controlled substances referenced in this complaint. Law enforcement bases its conclusions on their training and experience and the appearance and packaging of the substances recovered.

4. Law enforcement also recovered Mercedes's cellular phone, in the vicinity of the Fanny Pack. Mercedes also possessed approximately \$2,348.